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April 24, 2006

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

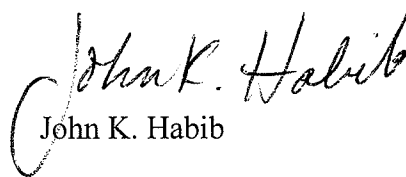
RE: D.T.E. 04-116- Investigation by the Department of Telecommunications and Energy On Its Own Motion Regarding the Service Quality Guidelines Established in Service Quality Standards for Electric Distribution Companies and Local Gas Distribution Companies, D.T.E. 99-84 (2001)

Dear Secretary Cottrell:

Please find attached the response of Boston Edison Company, Cambridge Electric Light Company and Commonwealth Electric Company d/b/a NSTAR Electric (the "Company") to the Seventh Set of Information Requests of the Department of Telecommunications and Energy (the "Department") to the electric companies in the above-referenced docket.

Thank you for your consideration.

Very truly yours,


John K. Habib

cc: Service List
Jody Stiefel, Hearing Officer
Joseph Rogers, Assistant Attorney General

Information Request DTE-LDC 7-1

- (a) Assuming such data is available, please calculate your Company's SAIDI and SAIFI for the years 2001-2005, using the IEEE Standard 1366-2003.
- (b) Provide a graphical comparison of your SAIDI performance using the Department's current method contrasted against your SAIDI performance using IEEE 1366-2003 during that period.
- (c) Provide a graphical comparison of your SAIFI performance using the Department's current method contrasted against your SAIFI performance using IEEE 1366-2003 during that period.
- (d) Chart and specify the dollar amount of SAIDI and SAIFI penalties, if any, that you have incurred under the Guidelines and would have incurred under IEEE 1366-2003.

Response

- (a) Please see Attachment DTE-LDC-7-1(a) calculating the annual SAIDI and SAIFI performance statistics for NSTAR Electric using IEEE 1366-2003, based on available data.
- (b) Please see Attachment DTE-LDC-7-1(b).
- (c) Please see Attachment DTE-LDC-7-1(c).
- (d) As noted by the Company in its response to Record Request DTE-3 in this proceeding, the IEEE standard is calculated based on a set of data components that differs from the data set used to calculate the SAIDI/SAIFI metrics under the Department's current service quality guidelines. NSTAR Electric has only three years of historical data (commencing 2003) for Boston Edison Company and Commonwealth Electric Company, two years of historical data for Cambridge Electric Light Company, to determine penalties or offsets that may have been incurred had the IEEE standard been required. Prior to 2003, the Company did not compile data on outages affecting a single customer or single transformer, each of which is a component of the IEEE calculation.

In order to perform a calculation of penalties and/or offsets, the Company would need a minimum of three years of data to calculate a statistically valid benchmark, and a fourth year to compare to the benchmark. The Company believes that the creation of proxy data to fill in missing data points would result

NSTAR Electric
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Person Responsible: John O'Brien
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in unreliable and unrepresentative calculations of actual Company performance. Accordingly, the Company does not have a sufficient amount of data to calculate penalties or offsets using IEEE data and cannot perform the requested analysis.

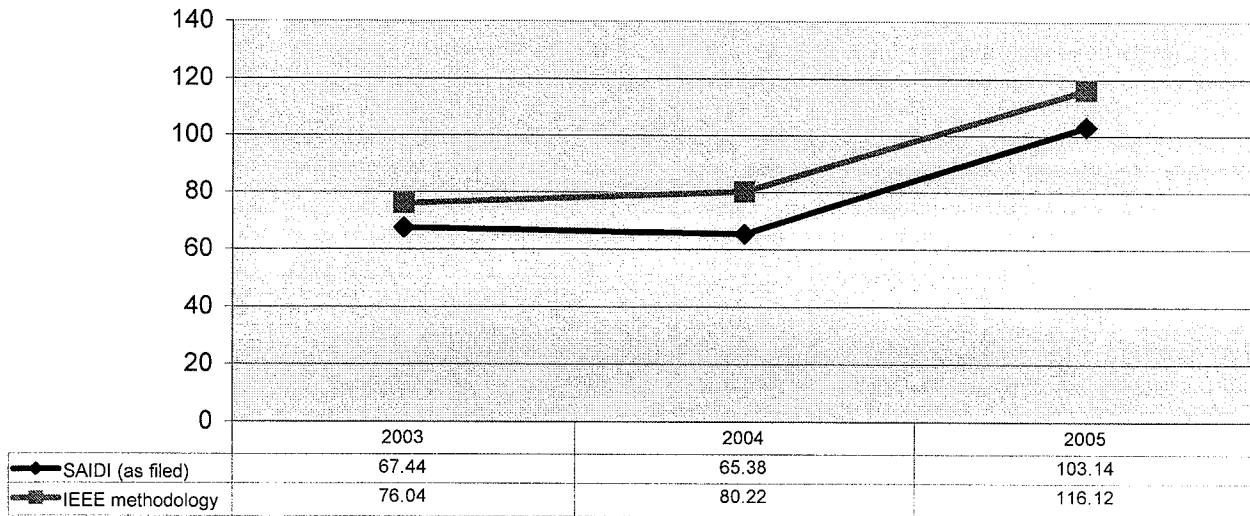
Attachment DTE-LDC-7-1(a)

	As Filed			IEEE 1366 methodology		
	Boston Edison Company	Commonwealth Electric Company	Cambridge Electric Light Company	Boston Edison Company	Commonwealth Electric Company	Cambridge Electric Light Company
2003 SAIDI	67.44	92.52	48.18	76.04	101.05	59.19
2004 SAIDI	65.38	51.57	49.29	80.22	69.20	60.31
2005 SAIDI	103.14	121.29	n/a	116.12	112.47	n/a
2003 SAIFI	0.961	1.202	0.456	1.657	1.605	1.051
2004 SAIFI	1.101	0.758	0.621	1.463	1.150	1.187
2005 SAIFI	0.924	1.310	n/a	1.342	1.707	n/a

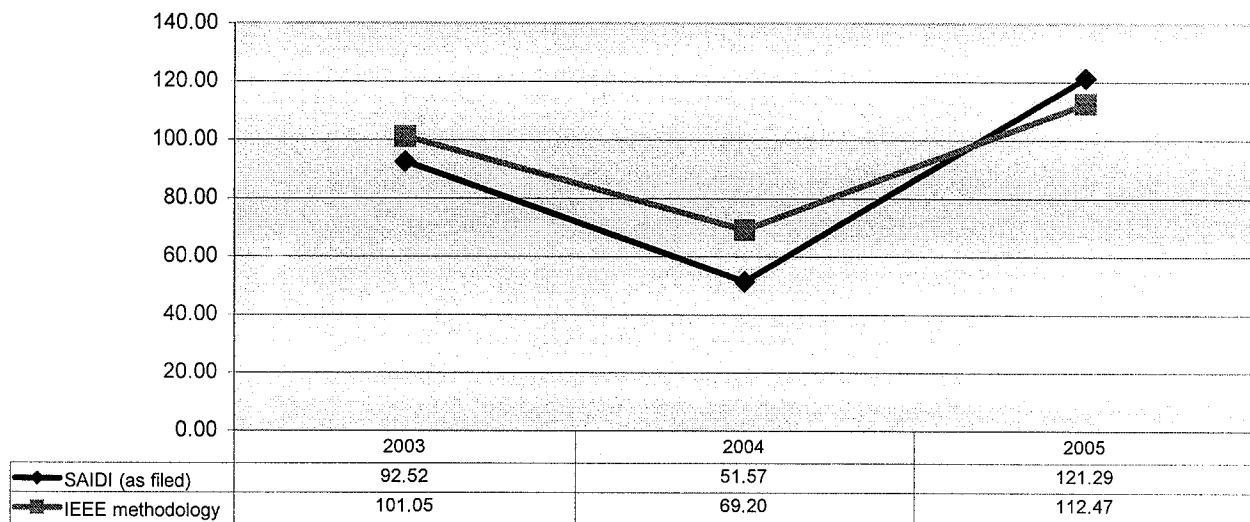
Note:

2005 SAIDI and SAIFI for Cambridge Electric is not available at this time. Cambridge Electric Light Company has filed an extension with the Department. The Company requires the additional time to finalize the reliability portion of the report with regard to certain data that is subject to the provisions of the Company's Department-approved rate settlement agreement.

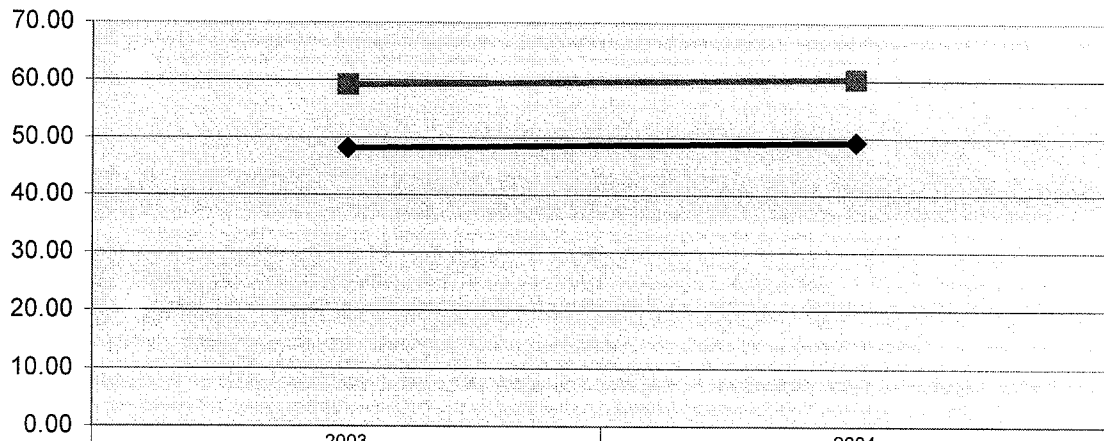
Boston Edison
SAIDI as filed and under IEEE 1366 methodology



Commonwealth Electric
SAIDI as filed and under IEEE 1366 methodology

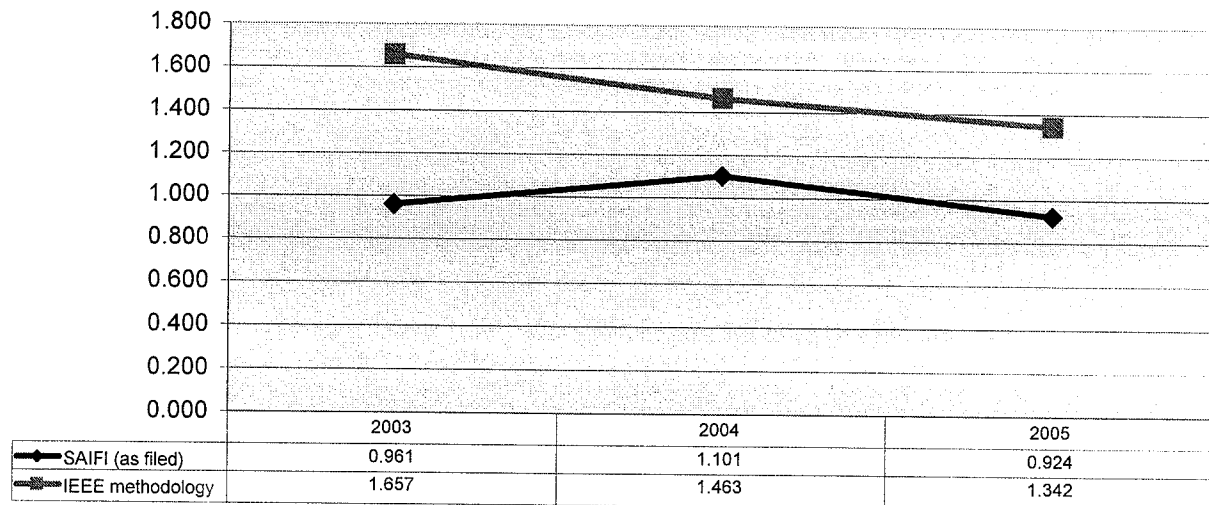


Cambridge Electric
SAIDI as filed and under IEEE 1366 methodology

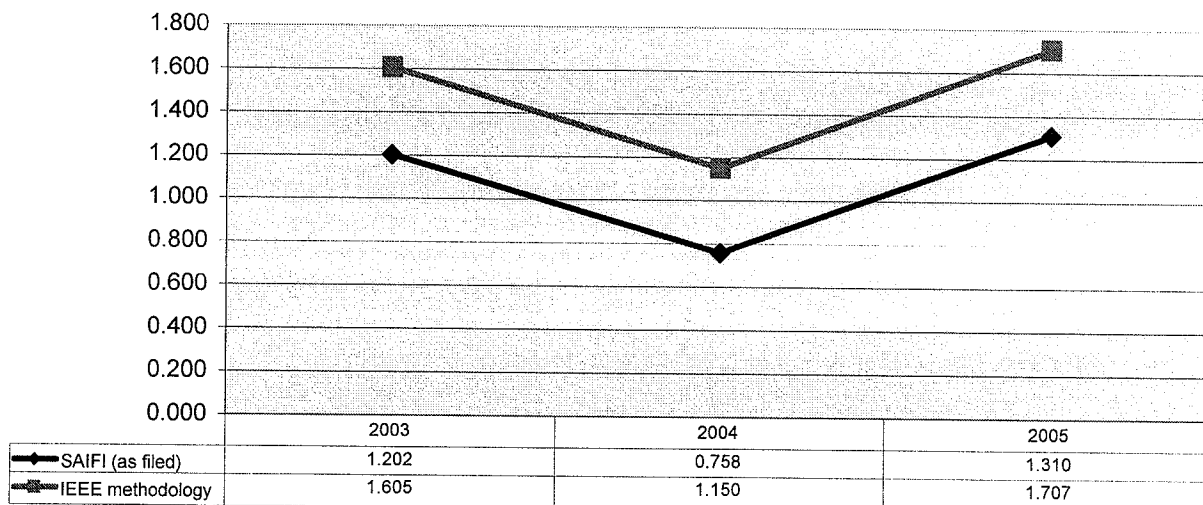


	2003	2004
SAIDI (as filed)	48.18	49.29
IEEE methodology	59.19	60.31

Boston Edison
SAIFI as filed and under IEEE 1366 methodology



Commonwealth Electric
SAIFI as filed and under IEEE 1366 methodology



Cambridge Electric
SAIFI as filed and under IEEE 1366 methodology

